

Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

*In re YARDI REVENUE MANAGEMENT
ANTITRUST LITIGATION.*

MCKENNA DUFFY, individually and on
behalf of all others similarly situated,

Plaintiffs.

v.

YARDI SYSTEMS, INC., *et al.*,

Defendants.

No. 2:23-cv-01391-RSL

**JOINT STIPULATION
REGARDING PHASE ONE
SCHEDULE AND [PROPOSED
ORDER]**

**NOTE ON MOTION CALENDAR:
June 30, 2025**

(Consolidated with Case Nos.
2:24-cv-01948; 2:24-cv-02053)

Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiffs McKenna Duffy and Michael Brett, Defendant Yardi Systems, Inc. (“Yardi”) (together with Plaintiffs, the “Parties”), by and through their respective counsel, hereby jointly stipulate as follows:

1. WHEREAS, Plaintiffs filed the Class Action Complaint in the above captioned case (“*Duffy*”) on September 8, 2023;

2. WHEREAS, Plaintiffs filed a First Amended Complaint (the “FAC”) in *Duffy* on November 3, 2023;

3. WHEREAS, on February 3, 2025, *Duffy* was consolidated with other similar federal actions;

1 4. WHEREAS, Plaintiffs filed an Amended Consolidated Class Action Complaint
2 (the “Consolidated Complaint”) on March 5, 2025;

3 5. WHEREAS, Plaintiffs’ Consolidated Complaint alleges complex antitrust claims;

4 6. WHEREAS, on March 24, 2025, the Court entered an order providing for the
5 staging of discovery and limiting Initial Discovery during Phase One as follows:

6 The Court finds that there is good cause to conduct an initial four-month phase of
7 discovery from Yardi focused on how its revenue management software functions,
8 what inputs are used, how it generates pricing recommendations, whether it uses or
9 shares confidential, non-public information and for what purposes, how clients can
10 control or impact the pricing recommendations, how clients actually configure the
11 software, and the rate at which Yardi’s pricing recommendations are adopted.
12 (Dkt. 278, “Order Granting In Part Defendants’ Motion For Phased Discovery,” at 3.);

13 7. WHEREAS, the Court’s March 24, 2025 Order set a July 24, 2025 deadline for any
14 summary judgment motion by Yardi;

15 8. WHEREAS, the Parties have been actively engaged in Initial Discovery, including
16 conducting regular meet-and-confers, and as a result of which Yardi has agreed to produce certain
17 discovery material, including (but not limited to) those categories which the Court identified;

18 9. WHEREAS, Plaintiffs and Yardi have met and conferred repeatedly and agreed to
19 review and produce custodial discovery from numerous Yardi custodians during the Initial
20 Discovery period and the Parties agree that Yardi will need additional time to review and produce
21 documents;

22 10. WHEREAS, the Parties continue to work collaboratively on discovery issues and
23 jointly agree on the need for additional time to complete Initial Discovery.

24 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs
25 and Yardi, that subject to the Court’s approval, the case schedule shall be amended as follows:
26

- Yardi will commence rolling productions of its documents by July 8, 2025;
- Yardi will complete substantial production of its documents by August 15, 2025;
- The deadline to complete Initial Discovery is continued from July 24, 2025 to October 31, 2025;
- The summary judgment briefing schedule shall be continued as follows:

	Current Schedule	Proposed Schedule
Summary Judgment Motion	July 24, 2025	November 7, 2025
Summary Judgment Opposition	N/A	December 19, 2025
Summary Judgment Reply	N/A	January 23, 2026
Summary Judgment Hearing	N/A	At the Court's Convenience

11. The parties will submit a joint status report and discovery plan for Phase Two of this action within 14 days of the Court's hearing on any Phase One summary judgment motion.

STIPULATED to this 30th day of June, 2025.

Presented by:

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**[PROPOSED] ORDER RE: PHASE
ONE SCHEDULE**

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IT IS SO ORDERED pursuant to the stipulation regarding the Phase One schedule.

DATED this _____ day of _____ 2025.

The Honorable Robert S. Lasnik
United States District Judge